

HON. JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NEXT LEVEL VENTURES, LLC, a
Washington limited liability company,

Plaintiff,

v.

AVID HOLDINGS LTD. F/K/A ALDEREGO
GROUP LTD., a Hong Kong, S.A.R. limited
liability company,

Defendant.

NO. 2:23-mc-00052-JCC

**STIPULATED MOTION AND
[PROPOSED] ORDER SETTING TIME
TO RESPOND TO APPLICATION FOR
SUPPLEMENTAL WRIT OF
EXECUTION**

NOTING DATE: March 13, 2025

The parties, by and through their counsel, stipulate and agree as follows:

1. Plaintiff Next Level Ventures, LLC (“Next Level”), filed its Application for Supplemental Writ of Execution on March 6, 2025 (ECF No. 29) (the “Supplemental Application”).

2. On March 7, 2025, Defendant Avid Holdings, Ltd. (“Avid”), notified the Court that it intends to object to Plaintiff’s Supplemental Application (ECF No. 30).

3. On March 11, 2025, Next Level objected to Avid’s Notice (ECF No. 31).

STIPULATED MOTION AND [PROPOSED] ORDER AS TO
BRIEFING SCHEDULE FOR APPLICATION
FOR SUPPLEMENTAL WRIT OF EXECUTION - 1

(USDC CASE NO. 2:23-mc-00052-JCC)

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(206) 628-6600

1 4. The parties have conferred to identify a briefing schedule regarding Plaintiff's
2 Supplemental Application.

3 5. Without waiving any defenses or rights, the parties stipulate and agree that Avid
4 may have until March 28, 2025, to file its objection to the Supplemental Application.

5 6. The parties further stipulate and agree to extend Next Level's deadline to file a
6 reply in support of its Supplemental Application to April 4, 2025.

7 7. The parties stipulate and agree that they reserve all rights and defenses. Nothing
8 in this Stipulation, including the fact that the parties entered into this Stipulation, waives any
9 rights or defenses.

10 8. The parties therefore request the Court to enter the proposed order, set out below,
11 adopting this proposed briefing schedule as to Next Level's Supplemental Application.

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13 IT IS SO STIPULATED.

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STIPULATED MOTION AND [~~PROPOSED~~] ORDER AS TO
BRIEFING SCHEDULE FOR APPLICATION
FOR SUPPLEMENTAL WRIT OF EXECUTION - 2

(USDC CASE NO. 2:23-mc-00052-JCC)

4926-1224-8104.1

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1 DATED this 13th day of March, 2025.

s/ Tim Cunningham

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s/ Eliot M. Harris

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f/k/a ALDEREGO Group Ltd.**

25 STIPULATED MOTION AND [~~PROPOSED~~] ORDER AS TO
BRIEFING SCHEDULE FOR APPLICATION
FOR SUPPLEMENTAL WRIT OF EXECUTION - 3

(USDC CASE NO. 2:23-mc-00052-JCC)

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ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated this 13th day of March 2025.



John C. Coughenour
United States District Judge

STIPULATED MOTION AND [~~PROPOSED~~] ORDER AS TO
BRIEFING SCHEDULE FOR APPLICATION
FOR SUPPLEMENTAL WRIT OF EXECUTION - 4

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing to all CM/ECF participants.

DATED this 13th day of March, 2025.

s/ Eliot M. Harris

Eliot M. Harris, WSBA # 36590

STIPULATED MOTION AND [~~PROPOSED~~] ORDER AS TO
BRIEFING SCHEDULE FOR APPLICATION
FOR SUPPLEMENTAL WRIT OF EXECUTION - 5

(USDC CASE NO. 2:23-mc-00052-JCC)

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